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April 8, 2021

Via CM/ECF

The Honorable Paul G. Gardephe
United States District Court
Southern District of New York
40 Foley Square, Room 705
New York, NY 10007

RE: *Amilcar Romeo Perez, et al. v. Third Avenue Food Corp. (D/B/A Tivoli Cafe), et al.*
Case No.: 20-cv-09832

Your Honor,

This office has been recently retained to represent the Defendants in the above-referenced matter. Plaintiffs' counsel has agreed to withdraw the Motion for Default Judgment against all named Defendants, as this office was recently retained by Defendants. We write jointly with Plaintiffs' counsel to request a three (3) week extension of time, until April 23, 2021, for Defendants to Answer or otherwise respond to the complaint. As the Court is aware Defendants' counsel filed a notice of appearance on April 6, 2021, based on a representation of the entities counsel that we have authority to proceed on behalf of the entity. A resolution reflecting the same is forthcoming. Counsel will be filing Answers on behalf of all Defendants. This is the parties' first request for an extension of time.

We appreciate Your Honor's consideration.

Respectfully submitted,


Maria Filindarakis, Esq. (MF2127)

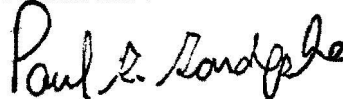
Cc: Kevin Johnson, Esq. Via Email / ECF
kjohnson@faillacelaw.com

MEMO ENDORSED

The Clerk of Court is directed to terminate Plaintiffs' motion for default judgment as withdrawn. (Dkt. No. 22)

The default judgment hearing scheduled for April 29, 2021 is adjourned sine die.

SO ORDERED.



Paul G. Gardephe
United States District Judge

April 9, 2021